

Saint Benedict Press, LLC – Privilege Log – June 26, 2018

| Bates Stamped Number | Document Date | Type of Document | Person in Possession of the Document | Author of the Document                          | Reason for Not Producing   |
|----------------------|---------------|------------------|--------------------------------------|---|--|
| SBPP-00219           | 01/03/1974    | Letter           | Natalie D. Potter                    | Michael F. Roberts<br>The Mercier Press Limited | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product. |
| SBPP-00220           | 05/12/1973    | Letter           | Natalie D. Potter                    | Thomas A. Nelson                                | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product. |
| SBPP-00221           | 11/29/1973    | Letter           | Natalie D. Potter                    | Michael F. Robert<br>The Mercier Press Limited  | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product. |
| SBPP-00222           | 09/28/1973    | Letter           | Natalie D. Potter                    | Thomas A. Nelson                                | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product  |

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| SBPP-00242           | Undated       | Bookcover  | Natalie D. Potter                    | Dr. Ludwig Ott         | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product. |
| SBPP-00245           | 09/16/1974    | Letter   | Natalie D. Potter                    | Thomas A. Nelson       | Redaction of handwritten note made by Conor Gallagher – attorney/client privilege, created in anticipation of litigation, attorney work product. |
| SBPP-00271           | 07/18/2011    | Email  | Natalie D. Potter, Jonathan Buchan   | Brent Klaske           | Redaction of email header– attorney/client privilege   |
| SBPP-00278           | 02/05/2014    | Email  | Natalie D. Potter, Jonathan Buchan   | Kathy Anderson         | Redaction of email header– attorney/client privilege   |
| SBP- 02250-02253     | Various       | Spreadsheet – Redaction of certain customer names                                      | Natalie D. Potter, Jonathan Buchan   | Defendant              | Confidential Proprietary Information   |
| SBPP-00289-00290     |               | Screenshot of software used to track orders with handwritten notes regarding the same. | Natalie D. Potter                    | Natalie D. Potter      | Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial.  |

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| N/A                  | Various         | Timelines created by counsel   | Natalie D. Potter, Jonathan Buchan, Defendant                            | Natalie D. Potter   | Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial. |
| N/A                  | Various         | Various Emails, Memorandums, to and from client, and to insurance carrier representative | Natalie D. Potter, Jonathan Buchan, Defendant's insurance carrier Hiscox | Jonathan Buchan & Natalie D. Potter, Conor Gallagher  | Attorney/client privilege, attorney work product, created in anticipation of litigation of for trial. |
| N/A                  | Various         | Emails regarding case strategy and evaluation and related issues                         | Natalie D. Potter, Jonathan Buchan, Defendant                            | Jonathan Buchan & Natalie D. Potter and Conor Gallagher, Bob Gallagher, Rick Rotondi, Mara Persic and other representatives of Defendant. | Attorney/client privilege, attorney work product.   |
| N/A                  | Various         | Emails and attorney notes regarding responding to Plaintiff's discovery requests         | Natalie D. Potter, Jonathan Buchan, Defendant                            | Jonathan Buchan & Natalie D. Potter and Conor Gallagher, Bob Gallagher, Rick Rotondi, Mara Persic and other representatives of Defendant. | Attorney/client privilege, attorney work product, created in anticipation of litigation or for trial. |
| N/A                  | January 8, 2013 | Emails regarding researching Plaintiff's claims  | Natalie D. Potter, Jonathan Buchan, Defendant                            | Employee of Defendant and Sharon O'Donovan  | Created in anticipation of litigation or for trial.   |

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| N/A                  | January 7, 2014 to January 21, 2014 | Emails between Defendant's employee and Francesca Bressan regarding researching Plaintiff's claims                         | Natalie D. Potter, Defendant                  | Employee of Defendant & Francesca Bressan | Created in anticipation of litigation or trial.     |
| N/A                  | November 8, 2017                    | Emails between current employee of client and former employee of client regarding evaluating Plaintiff's claims            | Natalie D. Potter, Jonathan Buchan, Defendant | Mara Persic & Mary Lester                 | Created in anticipation of litigation or for trial. |
| N/A                  | Various                             | Print offs from various websites regarding research conducted by Defendant's employees in evaluation of Plaintiff's claims | Natalie D. Potter, Jonathan Buchan, Defendant | Defendant                                 | Created in anticipation of litigation or for trial. |

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| N/A                  | Various       | Emails, notes, correspondence, and other similar documents  | Conor Gallagher, John Nipp, Esq., Jonathan Buchan, Natalie D. Potter | Conor Gallagher, John Nipp, Esq.        | Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.<br><br>Mr. Nipp consulted with Defendant regarding the case.   |
| N/A                  | Various       | Emails, notes, correspondence, and other documents  | Conor Gallagher, Ryan Monk, Esq.                                     | Conor Gallagher, Ryan Monk, Esq.        | Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.<br><br>Mr. Monk consulted with Defendant regarding the case.   |
| N/A                  | ?             | Possible emails, and notes regarding a conversation between Conor Gallagher and Marshall Leaffer, Esq. regarding Plaintiff's claims | Conor Gallagher, Marshall Leaffer, Esq.                              | Conor Gallagher, Marshall Leaffer, Esq. | Attorney client privilege/ Attorney work product, created in anticipation of litigation of for trial.<br><br>To date Mr. Gallagher has been unable to locate correspondence with attorney Leaffer and is unsure if such correspondence exists at this time as the consultation may have taken place only over the phone. |
| SBP-02298-02317      | Various       | Royalty Reports   | Natalie D. Potter, Jonathan Buchan, Defendant                        | Defendant's certified public accountant | Redacted titles not at issue in this case.   |

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| N/A                  | Various       | Emails, correspondence, notes and other items relating to Defendant's acquisition of TAN | Defendant Paula K Jacobi, Esq. Barnes & Thornburg LLP, who represented Defendant in the acquisition. | Paula K Jacobi, Esq. and the firm Barnes & Thornburg LLP | Attorney client privilege, attorney work product. |